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Attorneys for Defendants STRUCTURE TONE, INC. s/h/a STRUCTURE TONE  
(UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE  
LITIGATION

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LUIS MORAN AND KETTY MORAN,

Plaintiffs,

-against-

**NOTICE OF  
ADOPTION**

**08 CIV 2243**

100 CHURCH, LLC, 120 BROADWAY CONDOMINIUM  
(CONDO #871), 120 BROADWAY HOLDINGS, LLC, 120  
BROADWAY PROPERTIES, LLC, 120 BROADWAY, LLC,  
222 BROADWAY, LLC, ALAN KASMAN DBA KASCO,  
AMBIENT GROUP, INC., AMERICAN EXPRESS BANK  
LTD, AMERICAN EXPRESS COMPANY, AMERICAN  
EXPRESS TRAVEL RELATED SERVICES COMPANY,  
INC., ANN TAYLOR STORES CORPORATION, BATTERY  
PARK CITY AUTHORITY, BFP ONE LIBERTY PLAZA,  
CO., LLC., BFP TOWER C CO. LLC., BFP TOWER C MM  
LLC., BLACKMON-MOORING-STEAMATIC CATASTROPHE,  
INC. D/B/A BMS CAT, BOARD OF MANAGERS OF THE  
120 BROADWAY CONDOMINIUM (CONDO #871),  
BROOKFIELD FINANCIAL PROPERTIES, INC.,  
BROOKFIELD FINANCIAL PROPERTIES, LP,  
BROOKFIELD PARTNERS, LP, BROOKFIELD  
PROPERTIES CORPORATION, BROOKFIELD  
PROPERTIES HOLDINGS INC., CHASE MANHATTAN  
BANK CORPORATION, CITIBANK, NA, CUNNINGHAM  
DUCT CLEANING CO., INC., CUSHMAN & WAKEFIELD,  
INC., ENVIROTECH CLEAN AIR, INC., GENERAL RE  
SERVICES CORP., GPS ENVIRONMENTAL  
CONSULTANTS, INC., HILLMAN ENVIRONMENTAL  
GROUP, LLC., INDOOR ENVIRONMENTAL

TECHNOLOGY, INC., KASCO RESTORATION SERVICES CO., LAW ENGINEERING P.C., LEHMAN BROTHERS HOLDINGS INC., LEHMAN BROTHERS, INC., LEHMAN COMMERCIAL PAPER, INC., MERRILL LYNCH & CO., INC., NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC., NEW LIBERTY PLAZA LP, NEW YORK CITY INDUSTRIAL DEVELOPMENT AGENCY, NEW YORK CITY INDUSTRIAL DEVELOPMENT CORPORATION, NOMURA HOLDING AMERICA, INC., NOMURA SECURITIES INTERNATIONAL, INC., ONE LIBERTY PLAZA, ROYAL AND SUN ALLIANCE INSURANCE GROUP, PLC, SILVERSTEIN PROPERTIES, INC., STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC., THE BOARD OF MANAGERS OF THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), THE CITY UNIVERSITY OF NEW YORK, THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), TOSCORP INC., TRAMMELL CROW COMPANY, TRAMMELL CROW CORPORATE SERVICES, INC, TRC ENGINEERS, INC., TUCKER ANTHONY, INC., UBS FINANCIAL SERVICES, INC. F/K/A SWISS BANK CORPORATION, VERIZON NEW YORK, INC., WESTON SOLUTIONS, INC., WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY PLAZA, CO. GP, CORP., WFP RETAIL CO. G.P. CORP., WFP RETAIL CO. L.P., WFP TOWER A CO., WFP TOWER A CO. G.P. CORP., WFP TOWER A. CO., L.P., WFP TOWER B CO. G.P. CORP., WFP TOWER B HOLDING CO., LP, WFP TOWER B CO., L.P., WFP TOWER D CO. G.P. CORP., WFP TOWER D HOLDING CO. I L.P., WFP TOWER D HOLDING CO. II L.P., WFP TOWER D HOLDING I G.P. CORP., WFP TOWER D. CO., L.P., WORLD FINANCIAL PROPERTIES, L.P., AND ZAR REALTY MANAGEMENT CORP., ET AL

Defendants.

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PLEASE TAKE NOTICE that defendants, STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC. (hereinafter "STRUCTURE TONE"), as and for their responses to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, hereby adopts STRUCTURE TONE's




Answer to the Master Complaint dated July 30, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

To the extent that STRUCTURE TONE's Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above-captioned matter, STRUCTURE TONE denies knowledge or information sufficient to form a belief as to the truth of such specific allegations.

WHEREFORE, STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC., demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
July 16, 2008



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